

1979

COMPLAINT
13 H

June 26, 1979

Mrs. Robert Irish

Dear Mrs. Irish:



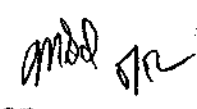
Your complaint of noxious fumes from a barge cleaning operation located on the Oyster Creek Intracoastal Canal was investigated on June 13, 1979.

The barge cleaning facility, Gulfco Incorporated, formerly Chromalloy, Gulfco Division, was visited and the manager, Mr. Tom Randolph admits that the potential for such odor does exist at his facility, but denies any operations on the date of the complaint which could have been responsible.

While I am unable to state with any certainty that the odor you experienced did not come from this facility, neither was I able to confirm that it did.

If you should experience a recurrence of the malodor, any other air pollution problem, or if you have any questions regarding this investigation, please feel free to contact me at this office.

Yours truly,

  
Charley Sims, S.E.T.
Engineering Technician

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bcc: File, Board, Compliance

T&E 000720

June 26, 1979

Mrs. Robert Irish

Dear Mrs. Irish:

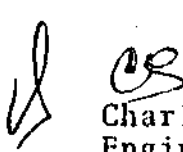
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Yours truly,


Charley Sims, S.E.T.
Engineering Technician

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bcc: File, Board, Compliance

T&E 000179

Date of Investigation 06 / 13 / 79

01 Action Code	C	County	Brazoria	Jurisdiction	070	Source Status:	AA <input checked="" type="checkbox"/> EX <input type="checkbox"/> DA <input type="checkbox"/>
Company Name, Location, Mailing Address		Facility Type		Enter Y or N in each box			
02	Gulco Inc.	16	33	Portable Unit	54		
03	County Road 756, North of SH 332	16	33	Federal Facility	54	Significant Pollutants	
04	P O Drawer 0	16	33	NSPS	54	PA	55
05	Freeport, Texas 77541	16	33	NESHAPS	54	SO2	55
06		16	33	EPA Major Source	54	HC	55
07		16	33	EPA Minor Source	54	CO	55
08		16	33	Other	54	Other	70
09	Group 39	16	33	Business/Products	32	Shipyards Fabrication & Repair	80
10 INVESTIGATIONS: Agency Comment 16 Alternate Method 17 Burning 18 Permit 19 20 (Permit No.) 27							
Complaint 1 NSPS 29 NESHAPS 30 Observed Sample 31 Progress Report 32 Order 33							
Sampling 34 Rule 7&8 35 SIP 36 Source Surveillance 37 Other 38 60							
Investigator 070 Codes 16 19 22 Technical Report 25 Source 26 29 32 35 36 41 44 47							
12 Management: Tom Randolph Title: Mgr., Marine Operation Phone: 713 233 7851							
13 Person Contacted: Charles Tanner Title: Yard Superintendent Phone: () -							
14 Complaint No. 072357 Date Received 06 12/79 Odor <input checked="" type="checkbox"/> Smoke <input type="checkbox"/> Dust <input type="checkbox"/> Other <input type="checkbox"/> 46							
15 Complaint No. Date Received 26 28 30 Odor <input type="checkbox"/> Smoke <input type="checkbox"/> Dust <input type="checkbox"/> Other <input type="checkbox"/> 46							
Findings: Confirmed <input type="checkbox"/> Unconfirmed <input checked="" type="checkbox"/> Odor <input type="checkbox"/> Smoke <input type="checkbox"/> Dust <input type="checkbox"/> Other <input type="checkbox"/> Cause <input type="checkbox"/>							
REPRESENTATIVE SAMPLES Sampling Results To Follow: Yes <input type="checkbox"/> No <input type="checkbox"/>							
Type	Source	Pollutant	Time	Actual	Allowable	% of Max.	% of Norm.
16	18	25	32	37	41	49	51
17	18	25	32	37	41	49	51
18	18	25	32	37	41	49	51
Emission Rate Code: lb/hr-01; lb/D-02; T/Y-03; SCFM-04; PPM-05; PPB-06; ug/M ³ -07; GR/SCF-08; lb/MBTU-09; %-10; None-11							
19 Emissions Status: In Compliance <input type="checkbox"/> Noncompliance <input type="checkbox"/> Short-Term Noncompliance <input type="checkbox"/> Undetermined <input type="checkbox"/>							
If Undetermined, why? Plant Down <input type="checkbox"/> Partial Operation <input type="checkbox"/> Needs Sample <input type="checkbox"/> Upset or Maintenance <input type="checkbox"/> Other <input type="checkbox"/> 47							
20 Violations: Rule 16 Rule 26 Rule 36 Order 46 TCAA 56							
21 Source 17 Source 25 Source 33 Source 41 Source 49							
22 Scheduled Date Action: 16 18 20 Formerly: Chromalloy, Gulco Div. 22 80							
23 Date 16 18 20 Comments 22 80							
24 PA 18 unc 25 con SO 30 unc 37 con HC 42 unc 49 con NO 54 unc 61 con 66 69 unc 76 con							
25 Compliance Action Recommended: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> Abatement Letter Sent: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>							
Emissions Inventory Form Needed: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> El accurate: Yes <input type="checkbox"/> No <input type="checkbox"/> Undetermined <input checked="" type="checkbox"/> Photos: Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>							
Permits: Approve <input type="checkbox"/> Deny <input type="checkbox"/> Exempt <input type="checkbox"/> Hold <input type="checkbox"/> Discuss <input type="checkbox"/> Engineer <input type="checkbox"/>							

Investigator(s)

Date

Approved by

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REGIONAL 000723

Investigator's Comments
Gulfco, Inc.
Freeport, Brazoria Co., Texas

6/13/79
BL-0016-H
Page 2

On 6/13/79, an investigation of a complaint of malodor (#072357) was conducted at this facility.

The complainant related that the odor was noted on 6/11/79 at approximately 2000 hours and was continuous for a least three hours. The odor was attributed to the Gulfco barge-cleaning facility because of the wind direction and was confirmed by the complainant to be emanating from the northeast side of the inter-coastal water canal.

While the complainant was aware of a barge cleaning operation in the area, the name of the company was not known. Local investigation confirms that Gulfco, Inc., formerly Chromalloy, Gulfco Division, is the only barge cleaning facility in the immediate vicinity and could have been the source of the alleged nuisance odor based on the wind direction.

According to Mr. Tom Randolph, Manager Marine Operations, and Mr. Charles Tanner, Yard Superintendent and Personnel and Safety Director, Chromalloy has recently divested Gulfco from its operation. The Gulfco operation is much smaller in scale than the previous operation, but is still as significant from a nuisance standpoint. The barge cleaning and repair operation involves the removal of all liquid residue, and salvage of as much of this material as possible. Internal cleaning of the barges which have contained various liquids, mostly aromatic hydrocarbons and frequently quite odorous, is generally accomplished with a cold water detergent washdown. On some occasions hot water is used, and when specified and furnished by the customer, solvents such as perchloroethylene are used. (When solvents such as this are used, the used solvent is also collected for salvage).

All salvaged hydrocarbons are stored in solid roof tanks. Five tanks are available and an attempt is made to segregate according to compatibility. The used detergent and water is placed into wastewater ponds. There are three evaporation ponds; number one is 0.54 acres in size and is the principle receiving pond; number three is 1.2 acres in size and receives effluent from number one; number two is 0.5 acres in size and is an alternate of number one. Pond number three contains a mechanical aerator which was not operating at the time of the investigation.

The more-volatile hydrocarbon residuals contained in the detergent wash probably evaporate rather quickly as they are added to pond number one. (There is an air gap of approximately one foot to 18 inches between the end of the pipe and surface of the pond.) The less-volatile hydrocarbons accumulate on top of the pond, while the water drains into pond number three.

There was a fairly heavy accumulation of thick hydrocarbons floating on pond number one, and much smaller quantities on the surface of number three. According to the management, the surface of number one is currently being skimmed and vacuumed-off. The truck was not present during the investigation and, according to the management, was not working the pond last Monday, the day of the complaint.

At the time of the investigation, a northeast wind was blowing. There were fairly strong odors from the evaporation ponds within close proximity, however, the odor was not noticeable at a nearby commercial marina downwind from the ponds.

T&E 000722

Investigator's Comments
Gulfco, Inc.
Freeport, Brazoria Co., Texas

6/13/79
BL-0016-H
Page 2

According to Mr. Tanner, the facility normally operates only one shift per day. If required, employees may work overtime after a short break until approximately 2000 hours. He stated that he could check to see if any overtime was worked last Monday, if requested, but it would take some time. He further stated that on Monday only one barge, which had contained caustic and was not odorous, had been cleaned.

In recent years the complaints involving this facility have consisted mostly of dust from sandblasting. The complainant indicates that there had been only one other incident of significant odor and that not recently. It is quite possible that the alleged odor did emanate from this facility, however, I was unable to establish any activity at the site at the time of alleged occurrence. Since a similar wind direction existed on the date of the investigation as was reported during the time of the complaint, and no nuisance odor was experienced, I am reluctant to confirm a nuisance condition. It does seem apparent however, that a strong nuisance potential does exist and the barge cleaning activity appears to be more prevalent now than previously noted according to investigative comments in the files.

Charley Sims
Charley Sims, S.E.T.
Engineering Technician *msl*

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